

Hon. John H. Chun

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FOUNDATION AGAINST INTOLERANCE AND RACISM, INC.	)	Civil Action No. 2:24-cv-01770-JHC
	)	
Plaintiff,	)	
	)	
v.	)	<b>STIPULATED MOTION AND</b>
	)	<b>[PROPOSED] ORDER TO</b>
	)	<b>EXTEND DEADLINES AND STAY</b>
STEVE WALKER, in his official	)	<b>DISCOVERY INITIATION</b>
capacity as Executive Director of the	)	
Washington State Housing Finance	)	
Commission,	)	<b>Note on Motion Calendar</b>
	)	<b>August 19, 2025</b>
Defendant.	)	

Plaintiff Foundation Against Intolerance and Racism Inc. (“Plaintiff”) and Defendant Steve Walker, in his official capacity as Executive Director of the Washington State Housing Finance Commission (“Defendant”), jointly move the Court to 1) extend the deadline for Plaintiff to file a Reply to Defendant’s Opposition to the Motion for Preliminary Injunction; 2) extend the deadline for Plaintiff to respond to the First Amended Complaint; and 3) hold the initiation of discovery in abeyance pending the Court’s decision on the Motion for Preliminary Injunction. In support of this Stipulated Motion, the Parties state the following:

1           1.       Plaintiff filed the First Amended Complaint in this matter on July 22,  
2       2025. Dkt. 28.

3           2.       Plaintiff filed a Motion for Preliminary Injunction on July 25, 2025.  
4       Dkt. 30.

5           3.       Defendant filed his Opposition to Plaintiff's Motion for Preliminary  
6       Injunction on August 15, 2025, in which he requested dismissal of Plaintiff's First  
7       Amended Complaint. Dkt. 36. Plaintiff's Reply to Defendant's Opposition is due on  
8       August 22, 2025. Local Civil Rule 7(d)(4).

9           4.       On August 18, 2025, Plaintiff's counsel asked Defendant if he would  
10      oppose Plaintiff's request for a one-week extension of time from the Court to file its  
11      Reply to the Opposition to the Motion for Preliminary Injunction, allowing the  
12      Plaintiff to file the Reply on or before August 29, 2025. Defense counsel also asked if  
13      Plaintiff would oppose a request from the Court to extend the deadline for  
14      Defendant to respond to the First Amended Complaint until two (2) weeks after the  
15      Court decides the pending Motion for Preliminary Injunction, as well as to hold  
16      discovery in abeyance pending that decision. Plaintiff's counsel requested the brief  
17      extension because of other matters impacting their availability. Defendant  
18      requested the extension given his request in his Opposition to the Preliminary  
19      Injunction motion to dismiss Plaintiff's First Amended Complaint based on lack of  
20      standing. Neither party opposed the other's request and agreed to this joint motion.

21          5.       For the foregoing reasons, the Parties therefore jointly and respectfully  
22      request that the Court hold the initiation of discovery in abeyance pending a  
23      decision on the Motion for Preliminary Injunction and extend the deadlines as  
24      follows:

Event	Revised Date
Plaintiff's Reply to Defendant's Opposition to the Motion for Preliminary Injunction	August 29, 2025

Defendant's Response to the First  
Amended Complaint

2 weeks after the Court's decision on  
the Plaintiff's Motion for Preliminary  
Injunction

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

Respectfully submitted this 19th day of August, 2025.

PACIFIC LEGAL FOUNDATION  
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PACIFICA LAW GROUP  
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**[PROPOSED] ORDER**

PURSUANT TO STIPULATION and good cause finding, IT IS SO ORDERED that the initiation of discovery in this matter be held in abeyance pending a decision on the Motion for Preliminary Injunction and deadlines be extended as follows:

<b>Event</b>	<b>Revised Date</b>
Plaintiff's Reply to Defendant's Opposition to the Motion for Preliminary Injunction	August 29, 2025
Defendant's Response to the First Amended Complaint	2 weeks after the Court's decision on the Plaintiff's Motion for Preliminary Injunction

DATED this \_\_\_\_ day of \_\_\_\_\_, 2025. \_\_\_\_\_

HON. JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE